Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:

DELETE, DELETE, DELETE
(Released March 12, 2025)

GN Docket No. 25-133

COMMENTS IN SUPPORT OF FEDERAL COMMUNICATIONS COMMISSION PROMOTING POLICIES OUTLINED BY PRESIDENT DONALD J. TRUMP IN EXECUTIVE ORDERS

Comes now, Metro North Communications, Incorporated, a Wisconsin for-profit corporation, (hereinafter, "Metro", by its President, Mark Heller, (hereinafter, "Heller") with specific recommendations which would facilitate and encourage investment in the communications business in the United States of America.

Full disclosure: Heller is a former national board of director member of Society of Broadcast Engineers; a former member of IEEE-Broadcast Technology Society - Administrative Committee, currently is a member of AFCCE and is a member of the NRSC Committee. Heller is also a broker of radio stations in Wisconsin and a member of the National Association of Media Brokers.

An attempt to reasonably answer the questions of: Cost - Benefit Analysis, Barriers to Entry, Market and Technological Changes, Elimination of Old Rules that hold back Innovation and other regulatory burdens, as noted in the Public Notice shall be addressed, within this filing. This filing makes a grand total of six distinct recommendations.

METRO REQUESTS THE COMMISSION OPEN WINDOWS FOR OPPORTUNITIES FOR NEW STANDARD BROADCAST (AM) RADIO STATIONS TO BE APPLIED FOR, GRANTED AND BUILT, AS HUNDREDS HAVE BEEN DELETED WITH NO CURRENT WAY TO SAVE THEM, OR RETUNED THEM TO SERVICE, USING FCC'S OWN "ANCIENT RULES".

Broadcast organizations and broadcasters have lobbied Congress in recent years, for a legislative bill mandating AM radio receivers in cars, but over the past 22 years, well over 820 AM licenses have been deleted. An Exhibit is at www.mesamike.org showing a list compiled by internet site of deletions. Metro has no relationship to the www.mesamike.org author. It is now time to embrace AM radio, fully. That, includes opening the windows for applications.

FCC SHOULD PROMOTING, AUTHORIZING OR DESIGNATING THE USE OF 1610 kHz FOR TRAVELLER'S INFORMATION STATIONS (T.I.S.) NATIONWIDE, AND MAKE AVAILABLE BY MORE MUNICIPALITIES, WITH THE USE OF TEN WATT TRANSMITTERS AND SHORTENED ANTENNAS, BUT WITH MUCH BETTER AUDIO IMPROVEMENT STANDARDS THAN ALLOWED UNDER CURRENT FCC "ANCIENT RULES".

Namely, allow for the expansion of the audio circuitry and processing (audio bandwidth) from current Five kHz. to meet current NRSC standards. (8 kHz). What stations exist today, sound more like police radios or "walkie-talkie radios", than a true quality broadcast, enjoyed everywhere else on the Standard Broadcast band in the United States. Technology to protect splatter to other channels is available and commonplace today, to meet the audio quality expansion. The Commission should modify the regulations which restrict the audio bandwidth from 5kHz to 8kHz, as part of this program. Insure that NRSC filtering, restricting audio above 8 kHz. Today's outstanding uses for T.I.S. include for Public Safety, Universities, National Park Service, State Historical Parks, Airports, Visitor Bureaus, Air Force Bases, Welcome Centers, Wildlife Refuges, as well as municipalities informing visitors of services.

OPEN THE EXPANDED BAND (1610 kHz to 1700 kHz) FOR NEW COMMERCIAL APPLICATIONS, AS WELL

Decades ago, Heller was in attendance, when Mr. William Ball, then a FCC employee made a presentation to engineers stating that 88 locations had been determined to fulfill the idea of adding the Expanded Band throughout the United States and Puerto Rico and US Virgin Islands. Out of 88 selections, it is estimated that only 55 are licensed and built, as of today. Expanded band power levels of 10 Kilowatts days, 1 Kilowatts night facilities would be welcomed in the United States which have been neglected for decades.

ALLOW FOR A WINDOW TO APPLY FOR DELETED FM STATIONS, AS WELL.

Not unnoticed, is the amount of FM radio licenses that are being returned and deleted, in very recent years. Most are Class A licenses in medium or small markets. The amount of time between a "deletion" being approved, and the window to apply for same, may be several years. Time lost, where a community could have its local service returned. This is another of FCC 'ancient rules' that should be addressed.

APPROVE USE OF AM TRANSMITTING ANTENNAS, KNOWN AS HIGH-EFFICIENCY BROADBAND ANTENNAS "HEBA ANTENNAS" CURRENTLY BEING MANUFACTURED FROM WORLDWIDE ANTENNA SYSTEMS FOR SMALL FOOTPRINTS ON LAND. (FIFTY FOOT BY FIFTY FOOT LAND AREA AND SEVENTY FIVE FOOT TOTAL HEIGHT!) LET'S GET CREATIVE!

This engineering concept, which is now reality, should be easily approved for 1 kilowatt daytime power, and some nighttime power levels. (Has been studied for eight years, and looks very promising!)
It is time for the FCC to embrace this concept, in order to save AM stations being deleted, due to property values exceeding the value of the station.

WHAT'S WRONG WITH ALLOCATING 87.9 FM? FRANKEN FM ON 87.75 ARE OPERATING? ALLOW IT, FOR SECONDARY TRAVELER INFORMATION SERVICE, AND CLASSIFY IT AS 'T.I.S.-2"

Proposed, 100 watts allocated and approved only for Community based FM, "non-translators" at 100 feet. This frequency is currently in use today, as an FM translator at K200AA in Sun Valley, NV. Previously, a licensee was granted to KSFH in Mountain View, CA. Recently, the Commission granted the permanent licenses of 'Franken FM' stations on 87.7 MHz.

COST-BENEFIT CONSIDERATIONS

Applicants and Grantees would pay FCC Filing Fees to apply. Upon grant and construction, Commercial Licensees would pay annual FCC regulatory fees. Employment opportunities not only for announcers, news presenters, sales representatives for commercial broadcasters, but also for Consulting Engineering firms, Communication Attorneys, Manufacturers of Transmitters, Audio Devices, Monitoring Equipment, Remote Control Systems, Transmitting Tower Manufacturers, of which, **MANY** (emphasis added) are U.S. based jobs. This proposal is a 'Win-Win-Win'. In the words of President Trump, "So much winning!".

REGULATION AS A BARRIER TO ENTRY

To date, it has been nearly impossible to ask for a proposed window of opportunity, to apply for an AM Radio Station, anywhere in the United States. With the exception of four, silenced stations around the St. Louis, Missouri area, this opportunity has been severely restricted for over 22 years. (note: Of the four stations around St. Louis, MO, including East St. Louis, IL, Highland, IL and DeSoto, MO....there were NO bidders!) Auction rules were and are terrible especially with small and medium market entry applicants.

OLD RULES ARE HOLDING BACK INNOVATION

Especially in the archaic requirements that Community Based 'Traveler Information Stations' must adhere to an audio bandwidth described at best with a bandwidth of only Five Kilohertz, and then stepped down with each Kilohertz above. For engineers on the ground, the prescribed instructions that are extremely hard to follow and fully understand. T.I.S. was established in 1977, part of Report and Order Docket 20509.

DO SMALL BUSINESSES FACE UNFAIR REGULATORY BURDENS?

Most recently, a Las Vegas, NV AM stations, namely KDWN, (now, DKDWN) and KXST (now, DKXST) was deleted. As a result of the sale of the land under the tower. While the large consolidator (Audacy) received $40 (forty) million dollars from the sale, it apparently never made any sense to them, that the station could have been moved to nearby, vacant land, outside of the city limits. The same consolidator reduced the licensed power level from 50 (fifty) kilowatts to 25 (twenty-five) kilowatts, of then KDWN along the way, to it's final 'slow death march'. By deleting this license, they limited competition and innovation in the very market where they compete, today.

Same, for another large consolidator (I Heart) turning off a 1,000 watt AM station in White Plains, NY. WFAS (now DWFAS) was deleted, after their lead engineer made national presentations to various engineering groups about how well their 'All-Digital' AM was clearly heard in Middle Manhattan, in New York City.

In almost, every other industry, where a large company would purchase, then kill off and bury an industry, where you are a Number One, Two or Three largest consolidators, would be considered 'Anti-Competitive Treachery'. Ancient FCC Rules have allowed this to happen, and it is clearly not in the Public's Interest, Safety or Necessity.

CONCLUSIONS

Metro has provided "Positive Improvement Recommendations" for:
1) Opening an AM (Standard Broadcast) window for deleted frequencies
2) Opening an EXPANDED BAND window for deleted / unbuilt stations
3) Approve audio frequency response on Traveler Information Radios
4) Propose authorizing use of 87.9 MHz for Traveler Information Radios.
5) Consider approving HEBA antennas for AM stations with land restrictions.
6) Open window for interested parties to apply for deleted FM frequencies

It is presented, with the wish that the broadcasting community, nationwide, would embrace these opportunities, to consider, comment and approve of the items that are recommended in this filing.

Respectfully submitted,

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March 25, 2025